

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

David Jackson,

Plaintiff,

Case No.: 1:21-cv-04529
Honorable Gary Feinerman

v.

Discover Financial Services Inc.

Defendant.

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NOTICE OF CLASS ACTION SETTLEMENT

Plaintiff David Jackson and Defendant Discover Bank, erroneously sued as Discover Financial Services Inc. (the “Parties”), jointly notify this Court that they have reached an agreement to resolve this matter on a class-wide basis. To that end, the Parties respectfully request that this Court stay all case deadlines and provide them 45 days (i) to additionally memorialize the terms of their settlement agreement, (ii) to establish a class action notice and administration plan, and (iii) for Mr. Jackson, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, to file his unopposed motion for preliminary approval of the class action settlement.

WHEREFORE, the Parties respectfully request that this Court stay all deadlines and provide them 45 days— until November 15, 2022—to finalize their class action settlement agreement and for Mr. Jackson to file his unopposed motion for preliminary approval of the Parties’ class action settlement.

Dated: September 30, 2022

Respectfully Submitted,

<p><u>IJH LAW</u> Ignacio J. Hiraldo, Esq. 1200 Brickell Ave Suite 1950 Miami, FL 33131 t. 786-496-4469 e. ijhiraldo@ijhlaw.com</p> <p>GREENWALD DAVIDSON RADBIL PLLC Michael L. Greenwald (<i>pro hac vice</i>) Aaron D. Radbil 5550 Glades Road, Suite 500 Boca Raton, FL 33431 t. 561-826-5477 e. mgreenwald@gdrlawfirm.com e. aradbil@gdrlawfirm.com</p> <p>HIRALDO PA <u>/s/ Manuel S. Hiraldo</u> Manuel S. Hiraldo, Esq. 401 E. Las Olas Blvd., Suite 1400 Ft. Lauderdale, FL 33301 t. 954-400-4713 e. mhiraldo@hirdolaw.com</p> <p>EISENBAND LAW, P.A. Michael Eisenband 515 E. Las Olas Boulevard, Suite 120 Ft. Lauderdale, Florida 33301 t. 954-533-4092 e. MEisenband@Eisenbandlaw.com Counsel for Plaintiff</p>	<p><u>/s/ Arjun P. Rao</u> STROOCK & STROOCK & LAVAN LLP Julia B. Strickland Arjun P. Rao Ali Fesharaki 2029 Century Park East, 18th Floor Los Angeles, California 90067-3086 Telephone: (310) 556-5800 Email: lacalendar@stroock.com</p> <p>-and-</p> <p>PILGRIM CHRISTAKIS LLP Anna-Katrina S. Christakis Ke Liu 321 North Clark Street, 26th Floor Chicago, Illinois 60654 Telephone: (312) 939-0920 Email: kchristakis@pilgrimchristakis.com Email: kliu@pilgrimchristakis.com</p> <p>Counsel for Defendant</p>
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